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Arizona Corporation Commission

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Attorneys for Intervenor-Applicant
IBEW Local 1116

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BEFORE THE ARIZONA

CORPORATION COMMISSION

IN THE MATTER OF THE
APPLICATION OF TRICO
ELECTRIC COOPERATIVE, INC.,
AN ARIZONA NONPROFIT
CORPORATION, FOR AUTHORITY
TO BORROW THE ADDITIONAL
SUM OF \$58,786,000 FROM THE
UNITED STATES OF AMERICA
(RDUP) AND THE ADDITIONAL
SUM OF \$25,194,000 FROM
NATIONAL RURAL UTILITIES
COOPERATIVE FINANCE
CORPORATION, AND TO
EVIDENCE SAID LOANS BY
EXECUTION OF LOAN
AGREEMENTS, PROMISSORY
NOTES AND SECURITY
DOCUMENTS REQUIRED BY THE
LENDERS.

Docket No. E-01461A-07-0433

IBEW LOCAL 1116'S REPLY IN
SUPPORT OF ITS APPLICATION
TO INTERVENE

In its perfunctory Objections to the Application to Intervene filed by Local Union 1116, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 1116"), Trico Electric Cooperative, Inc. ("Trico") incorrectly asserts that "[t]here is nothing that will occur in this proceeding that will in any manner affect the current or future collective bargaining agreements between Trico and the Union which are the Union's sole interest in

1 this proceeding and in Trico." In so doing, Trico glosses
2 over the fact that, according to its own Application (p. 3,
3 lines 7-8), "[s]aid borrowings are necessary to provide the
4 facilities required to provide electric service to Trico's
5 rapidly growing electric system[.]" Who, pray tell, does
6 Trico believe will be the people working in these new
7 facilities? Likewise, if Trico were to overextend itself
8 with respect to this loan package - something IBEW Local
9 1116 hopes, expects and wants to ensure will not be the case
10 - who, in addition to its creditors and customers, will be
11 the people most directly affected thereby? The answer to
12 both of these questions is self-evident, to wit, the persons
13 represented by IBEW Local 1116.

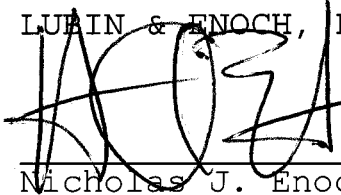
14 In ¶ 6 of its Opposition (p. 2), Trico asserts that
15 "[t]he Union has no more direct or substantial interest in
16 this proceeding than an individual employee of Trico[.]"
17 Overlooking the fact that IBEW Local 1116 represents a
18 substantial percentage of Trico's total workforce, what
19 Trico also fails to grasp is that Article XV, § 3 of the
20 Arizona Constitution expressly tasks this Commission with
21 the responsibility for making and enforcing reasonable
22 rules, regulations, and orders for the convenience, comfort,
23 and safety, and the preservation of the health of each and
24 every individual employee of Trico. As such, Trico's
25 Objection simply makes no sense as either a factual or legal
26 matter.

27 **WHEREFORE**, it is respectfully requested that IBEW Local
28 1116 be permitted to intervene in the above-captioned matter

as a party.

RESPECTFULLY SUBMITTED this 7th day of September, 2007.

LUBIN & ENOCH, P.C.



Nicholas J. Enoch, Esq.
Attorney for Intervenor-Applicant

Original and thirteen (13) copies
of IBEW Local 1116's Reply filed
this 7th day of September, 2007, with:

Arizona Corporation Commission
Docket Control Center
1200 West Washington Street
Phoenix, Arizona 85007-2996

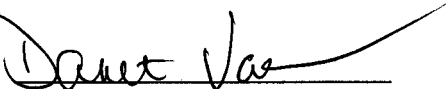
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